



Railroad Commission of Texas

## **RRC Specialized Pipeline Inspections**

July 22, 2021

The meeting will begin shortly.





# Navigating the Code: Gas Basics

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July 2021



# Power Point Presentation



This presentation is available for download from the RRC website at

<https://www.rrc.texas.gov/oil-and-gas/workshops-and-conferences/rrc-regulatory-webinars/regulatory-webinars-2021-schedule/>

# RRC Regulatory Overview



The Railroad Commission serves Texas through:

- Our stewardship of natural resources and the environment;
- Our concern for personal and community safety; and
- Our support of enhanced development and economic vitality for the benefit of Texans.

# Historical Overview



- Natural Gas Pipeline Safety Act of 1968
  - Interim Rules effective Dec 12, 1968
  - Final Rules effective Mar 13, 1971
- Basics of current Part 192 code
  - Amended to correct, modify, & add requirements
  - Currently 254 sections in 16 Subparts with 6 appendices
  - 56 Incorporated By Reference Standards (IBR)
- **PROMOTE PUBLIC SAFETY**

# Pipeline Regulations



- 49 CFR
  - Part 191 – Reporting Requirements
  - Part 192 – Gas Pipelines
- Part 199 – Drug Test
- TAC Title 16
  - Ch. 8 – Pipeline Safety
  - Ch. 18 – Damage Prevention



- 15 sections: 191.1 through 191.29
  - Scope & Definitions
  - Incident Notification (Immediate & Reports)
  - Annual Reporting (All system types)
  - Operator Identification (OPID)
  - Safety-Related Condition Reporting (SRCs)
  - National Pipeline Mapping System (NPMS)



- Subparts A – General to P – Distribution Integrity Management Program
  - **Retroactive Subparts (K I L A M O P):** Applies to all existing pipelines, regardless of the date of construction; Governs the operations, maintenance, remediation, & management of pipeline facilities
  - **Non-Retroactive Subparts (B C D E F G H J N):** Applied according to construction date, activation date, or effective date; also known as “grand-fathered”
  - Retroactivity is based on 192.13





- 3 Subparts with 36 Sections
  - Subpart A – Scope, Applicability, Definitions, and Stand-Down Waivers
  - Subpart B – Anti-Drug Plan requirements
  - Subpart C – Alcohol Misuse Plan requirements
  - Drug & Alcohol Testing is conducted per 49 CFR Part 40

# TAC Title 16, Chapter 8



- 4 Subchapters – A through D
- A: General Requirements & Definitions
  - Applicability & Standards; Definitions
- B: Requirements for All Pipelines
  - P-5; IMP; Records; Gathering; PS-48; Waivers
- C: Requirements for Gas Pipelines Only
  - Fees; Supplements; Leak Complaints; Reports; Public Education & Liaison; “Distribution Requirements”



- 12 Sections: 18.1 through 18.12
  - Scope, Applicability, Provisions, & Definitions
  - Excavator Notifications & Obligations
  - Excavator & Operator Obligations
  - General Marking Requirements
  - Excavator & Operator Marking Requirements
  - Excavation in the Tolerance Zone
  - Reporting Requirements



**CODE = LAW**

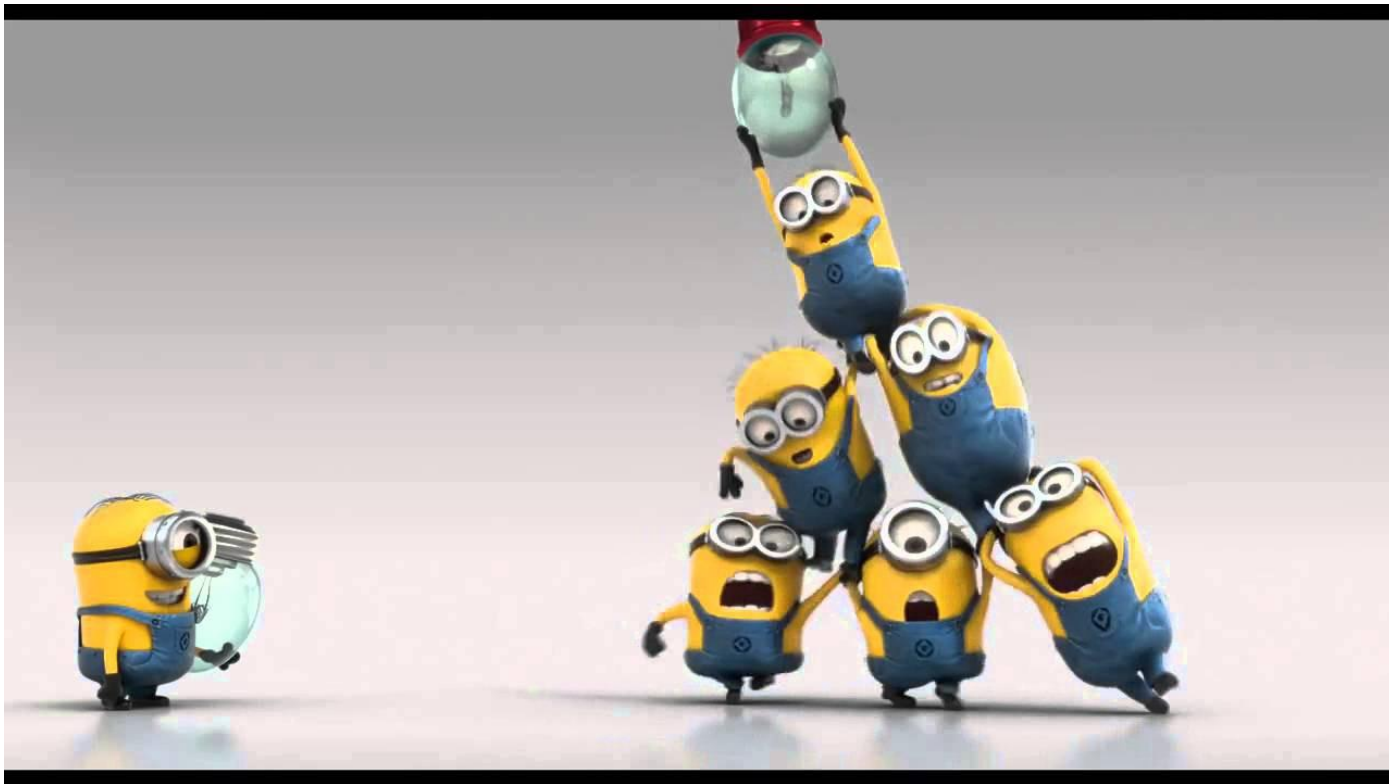
**Non-Compliance =  
Additional Risk**

**No Record = Did Not  
Happen**

# We Are Here to Help



**Q:** How many pipeline inspectors does it take to screw in a lightbulb?



# Pipeline Code Guidance (1 of 3)



- “this part” = **All** of 192
- “this subpart” = that subpart **only**
- “this section” = that section **only**
- Sections may have “sub-sections”
- Sections are applied in their **entirety**
- Sections are required by pipe type, facility, or component
- Sections are **NOT** independent

# Pipeline Code Guidance (2 of 3)



- “Shall,” “Will,” or “Must” = Mandatory & Imperative
- “May” = permitted or authorized
- “May Not” = not permitted or unauthorized
- “Includes” or “Including” = “including but not limited to-”
- No singular or plural, masculine or feminine
- Definitions: specific words or phrases are
  - Defined in 192.3 or 191.3, then
  - By Interpretation, Advisory Bulletin, or FAQ, then
  - By “Webster-Merriam”



- Minimum Safety Standards
  - Can voluntarily exceed minimum standards
  - Any written standards are enforceable
- Intervals of Inspection usually defined
  - Can do early, but not late
  - XX per calendar year, not to exceed XX months
- Recordkeeping intervals dependent on record
  - TAC 16, Ch. 8.105





## 192.7 – Incorporated By Reference Standards (formerly Appendix A)

- IBRs are included as though set out in full
  - 192.616(a) – API RP 1162
- When only a portion is referenced, the remainder is not incorporated
  - 192.241(c) – Section 9 of API Std 1104
- Only the Edition listed can be used
  - Exception: API Spec 5L 46<sup>th</sup> Edition

# Prescriptive vs Performance (1 of 3)



- Prescriptive Regulations – specific, established requirements that define the minimum
  - 192.625 – Odorization of Gas
  - Who, Where, What, & How are identified & required
- Performance Regulations – broad description of the minimum requirement that must be met
  - 192.613 – Continuing Surveillance
  - Operator determines unsatisfactory conditions, substantial changes, immediate hazard, and appropriate actions



## Prescriptive Regulations

- Advantages:
  - Easy to determine compliance
  - Easy to determine course of action
  - Gives uniform means of compliance
- Disadvantages:
  - Does not allow for variations
  - Does not state safety level
  - May require unnecessary cost



## Performance Regulations

- Advantages
  - Allows adaptation to individual situations
  - Encourages development of new equipment
  - Most economical solution to achieve safety
  - Promotes safety and not “letter of the law”
- Disadvantages:
  - Difficult to determine compliance
  - Operators may not understand
  - May create improper solutions and safety problems

# Thank You!



## Questions? Thanks!

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# Commissioner Contact Information



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## Evaluation

- Please complete the evaluation available on the RRC website at <https://survey.alchemer.com/s3/6403402/2021-RRC-Regulatory-Webinars-Oil-Gas-and-Pipeline-Safety-Evaluation>

## Archive Video

- A link to the archive video of the webcast will be available on the same webpage as the presentation.